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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92057941
Party	Plaintiff Clockwork IP, LLC
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Brad R. Newberg
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Signature	/brad r newberg/
Date	03/18/2015
Attachments	Clockwork-Barnaby-Request to Extend Trial Dates.pdf(148318 bytes)

CLOCKWORK IP, LLC

Petitioner,

V.

**BARNABY HEATING & AIR; and
MCAFFEE HEATING AND AIR
CONDITIONING CO., INC.,**

Registrant.

Cancellation No. 92057941
Reg. No. 3,618,331

The parties respectfully request that the Board extend all of the dates for Disclosures and Trial Periods listed on page twelve of its March 11, 2015 order by sixty (60) days.

Discovery Closes	CLOSED
Plaintiff's Pretrial Disclosures	3/31/2015
Plaintiff's 30-day Trial Period Ends	5/15/2015
Defendant's Pretrial Disclosures	5/30/2015
Defendant's 30-day Trial Period Ends	7/14/2015
Plaintiff's Rebuttal Disclosures	7/29/2015
Plaintiff's 15-day Rebuttal Period Ends	8/28/2015

The parties have jointly agreed that it would be in the best interests of all parties and in the interests of judicial efficiency if these dates were moved by sixty days. There are various reasons for this request, including the facts that: Clockwork has new counsel; McAfee has been joined as a result of the March 11, 2015 Order, and McAfee has its own counsel who is new to this case; and, the parties have agreed to use the extra time, in part, to work together to see if a business resolution can be reached. Furthermore, even if those discussions are not fruitful, the extension will also greatly enhance the parties' abilities to work within witnesses' schedules and the schedules of each counsel to reduce the likelihood of disputes regarding the taking of trial testimony.

Based on the foregoing, the parties therefore respectfully request that the disclosure and trial dates be rescheduled as follows:

Discovery Closes	CLOSED
Plaintiff's Pretrial Disclosures	5/30/2015
Plaintiff's 30-day Trial Period Ends	7/14/2015
Defendant's Pretrial Disclosures	7/29/2015
Defendant's 30-day Trial Period Ends	9/12/2015
Plaintiff's Rebuttal Disclosures	9/27/2015
Plaintiff's 15-day Rebuttal Period Ends	10/27/2015

Dated and Electronically Filed via ESTTA: March 18, 2015

CLOCKWORK IP, LLC

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BARNABY HEATING & AIR

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CERTIFICATE OF SERVICE

On March 18, 2015, this document was electronically filed with the TTAB system and also sent by first class mail to Julie Celum Garrigue, Celum Law Firm PLLC, 11700 Preston Rd, Suite 660, Pmb 560, Dallas, TX 75230, counsel for Barnaby Heating & Air, and Melissa Replogle, Replogle Law Office, LLC, 2661 Commons Blvd., Suite 142, Beavercreek, OH 45431, counsel for McAfee Heating and Air Conditioning Co., Inc.

/Brad R. Newberg/
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